

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>No. 3:24-CR-00151</b>
	)	<b>JUDGE RICHARDSON</b>
<b>v.</b>	)	
	)	
<b>MATTHEW ISSAC KNOOT</b>	)	

**MOTION TO CONTINUE TRIAL AND RELATED DEADLINES**

Through undersigned counsel, Matthew Knoot moves this Court to continue the trial in this matter, currently set for Tuesday, June 24, 2025, at 9:00 a.m. (D.E. 41). Counsel requests the Court continue the trial for up to ninety (90) days. Mr. Knoot also requests a continuance of all trial-related deadlines. In support of this motion, Mr. Knoot asserts the following:

1. The Court previously granted Mr. Knoot's request for a continuance on February 18, 2025. (D.E. 41)
2. On April 1, 2025, Mr. Knoot filed a motion to suppress evidence. (D.E. 49). The United States responded on April 14, 2025 (D.E. 52) and Mr. Knoot subsequently filed a reply in support of his motion on April 28, 2025 (D.E. 53).
3. On May 6, 2025, this Court ordered both parties to file additional briefing regarding Mr. Knoot's motion to suppress within 21 days. (D.E. 56) Undersigned counsel immediately began working on that brief.
4. Counsel and the defense team have been in constant communication with Mr. Knoot and have reviewed roughly 90% of the discovery provided by the government. As a result of recent conversations, counsel was made aware of new information he believes will assist

in preparation for trial. The defense team has also been engaged in investigatory leads for months.

5. Due to other work-related deadlines, motions practice, and the complex nature of this case, more time is needed to complete those investigations as counsel believes the results will be important to the trial defense.
6. Mr. Knoot understands the complexity of his case and agrees that more time is needed to investigate new leads, review technological discovery and evidence, and further finalize trial preparations.
7. Mr. Knoot has been in the community since he was released in August 2024. He has not had any issues with compliance.
8. Counsel has conferred with opposing counsel on this matter who stated his objection to this request.
9. This motion is filed contemporaneously with Mr. Knoot's signed, speedy trial waiver.

Based on the foregoing, Mr. Knoot requests this Court grant his motion and continue the trial and all related deadlines for up to 90 days.

Respectfully submitted,

s/ David Fletcher

DAVID FLETCHER  
Assistant Federal Public Defender  
810 Broadway, Suite 200  
Nashville, Tennessee 37203  
615-695-6951  
[David\\_fletcher@fd.org](mailto:David_fletcher@fd.org)

Attorney for Matthew Knoot

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2025, I electronically filed the foregoing *Motion to Continue Trial and All Related Deadlines* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Joshua Kurtzman, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, Tennessee, 37203.

s/ *David Fletcher*

DAVID FLETCHER